

Dora V. Lane
 Nevada Bar No. 8424
 Ascent Law, PC
 5470 Kietzke Lane, Ste. 300
 Reno, NV 89511-2099
 T: (775) 671-6171
 dora@ascent-employmentlaw.com

Emily M. Hobbs (*application pending*)
 Ascent Law, PC
 110 16th Street, Ste. 1460
 Denver, CO 80202
 T: (720) 933-0765
 emily@ascent-employmentlaw.com

Attorneys for Defendant KG MINING
 (BALD MOUNTAIN) INC.

Lonnie D. Giamela (*application pending*)
 Joel Moon (*application pending*)
 Fisher & Phillips LLP
 444 South Flower Street, Ste. 1500
 Los Angeles, CA 90071
 T: (213) 330-4454
 lgiamela@fisherphillips.com
 jmoon@fisherphillips.com

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SAMANTHE LOEHR, Individually and On
 Behalf of Others Similarly Situated,

Plaintiff

v.

KG MINING (BALD MOUNTAIN) INC.,

Defendant.

Case NO. 2:25-cv-00639-NJK

**STIPULATION FOR INTRADISTRICT
 TRANSFER**

Pursuant to LR IA 1-6 and LR 1-8, Plaintiff Samanthe Loehr (“Plaintiff”) and Defendant KG Mining (Bald Mountain) Inc. (“Defendant” or “KG Mining”) stipulate and agree that the above-captioned matter be transferred to the Northern Division of the United States District Court for the District of Nevada. The basis for the parties’ stipulation is as follows:

1. Local Rule IA 1-6 provides that the United States District Court for the District of Nevada has two unofficial divisions: (a) Southern Division—consisting of Clark, Esmeralda, Lincoln, and Nye counties; and (b) Northern Division—consisting of Carson City, Churchill,

Douglas, Elko, Eureka, Humboldt, Lander, Lyon, Mineral, Pershing, Storey, Washoe and *White Pine* counties. Local Rule IA 1-8(a) further indicates that civil actions such as this one “must be filed in the clerk’s office for the unofficial division of the court in which the action allegedly arose.”

2. Before the instant action’s filing, the parties communicated regarding the fact that, due to KG Mining (Bald Mountain)’s location in White Pine County, Plaintiff had to bring this lawsuit in the Northern Division of the United States District Court for the District of Nevada. *See e.g.*, ECF 1, ¶37 (“KG Mining operates the Bald Mountain mine, which ‘is . . . located in Nevada along the southern extension of the prolific Carlin trend[.]’”). Nevertheless, on April 9, 2025, Plaintiff inadvertently filed the case in the Southern Division of the United States District Court for the District of Nevada. *See* ECF 1. Given the Local Rule IA 1-6 and 1-8 mandates, and their prior communications on the subject, the parties respectfully request that the above-captioned matter be transferred to the Northern Division of the United States District Court for the District of Nevada.

Date: April 15, 2025

Respectfully submitted,

RODRIGUEZ LAW OFFICES, P.C.

ASCENT LAW, PC

By: /s/ Esther C. Rodriguez
 Esther C. Rodriguez
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
 esther@rodriguezlaw.com
Attorneys for Plaintiff

By: /s/ Dora Lane
 Dora V. Lane
 5470 Kietzke Lane, Suite 300
 Reno, Nevada 89511
 dora@ascent-employmentlaw.com
*Attorneys for Defendant KG Mining
 (Bald Mountain) Inc.*

This stipulation to transfer is **GRANTED**. Upon opening a new case in the unofficial northern division, the Clerk's Office is **INSTRUCTED** to close this case in the unofficial southern division.

IT IS SO ORDERED.

Dated: April 16, 2025



 Nancy J. Koppe
 United States Magistrate Judge